

Exhibit 78

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1 Q. I understand that your mother prepared three
2 different fact sheets in this case. Have you ever
3 looked at the different documents prepared in this
4 case?

5 A. I have not. I was unaware that Mom had
6 followed through or taken any legal action until
7 about two or three weeks before she passed away.

8 Q. Okay. And how did you learn that she was
9 part of this lawsuit?

10 A. Once my mom had hospice come in and she
11 started being heavily medicated, she asked me to
12 help her call one of the lawyers, I believe it was
13 the family lawyer, and she told me then, because she
14 needed -- her short-term memory at that time was not
15 dependable.

16 Q. Okay. Do you have an -- do you have an
17 understanding of when she prepared these plaintiff
18 profile forms in this case?

19 A. If you're asking me when my -- if I know
20 when my mom may have started wanting to pursue this
21 or --

22 Q. No. Let me -- let me go back. So we fill
23 out these plaintiff -- they call them Plaintiff
24 Profile Forms.

25 Do you need to take a moment?

1 A. No, ma'am. Someone is knocking at my door,
2 but there is somebody else here to answer it.

3 Q. Okay.

4 A. It's just a delivery. I apologize.

5 Q. No, that's fine.

6 A. Okay. We're good.

7 Q. So we prepare these Plaintiff Profile Forms
8 in this litigation, and it's some basic questions
9 that your mother would have likely gone over and
10 provided answers to counsel.

11 And based on your prior response, it sounds
12 like you have never looked at these different
13 documents?

14 A. I have not.

15 Q. Okay. And you haven't discussed any of that
16 with your mother before she passed; is that right?

17 A. I think that I told her I saw a commercial
18 and asked her about it maybe. Maybe we had a
19 conversation right after her diagnosis. However, I
20 was surprised to find out that Mom had taken legal
21 action and tried to pursue it. She didn't tell me
22 anything.

23 Q. Okay. And had she told any of your other
24 siblings?

25 A. I don't believe so.